



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

OCT 29 2008

The Honorable Gerald L. Zahorchak
Secretary of Education
Pennsylvania Department of Education
333 Market Street
Harrisburg, Pennsylvania 17126

Dear Secretary Zahorchak:

Thank you for submitting a proposal for consideration to participate in the Secretary's growth model pilot, which would enable Pennsylvania to implement a growth-based accountability model for the 2008–09 school year to meet the goals of the No Child Left Behind Act (NCLB). Each proposal is being reviewed internally to determine how well it meets the seven core principles laid out in the Secretary's letter on November 21, 2005, making it eligible to advance to peer review.

An initial review of Pennsylvania's proposal indicates that some additional information is needed to determine how it meets the seven core principles. Please provide information to answer the following questions found in the Department's peer review guidance (please see www.ed.gov/policy/elsec/guid/growthmodelguidance.doc for that information). The reference in parenthesis is to the particular element in the guidance document.

Principle 1. Universal proficiency

- How does the state accountability model hold schools accountable for universal proficiency by 2013–14? (Principle 1.1)
 - Does the state use growth alone to hold schools accountable for 100 percent proficiency? If not, does the state propose a sound method of incorporating its growth model into an overall accountability model that gets students to 100 percent proficiency by 2013–14? (Principle 1.1.1)
 - Please clarify how the inclusion of a growth model on top of the existing accountability system, particularly the inclusion of the Pennsylvania Performance Index (PPI), will ensure that all schools are held accountable for 100 percent proficiency by 2013–14.
- Has the state proposed technically and educationally sound criteria for “growth targets” for schools and subgroups? (Principle 1.2)
 - Has the state adequately described the rules and procedures for establishing and calculating “growth targets”? (Principle 1.2.2)
 - How does the state plan to establish growth targets between grades 8 and 11 and does the assessment system support such an approach?
- Has the state proposed a technically and educationally sound method of making annual judgments about school performance using growth? (Principle 1.3)

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

- Has the state adequately described how annual accountability determinations will incorporate student growth? (Principle 1.3.1)
 - Please clarify whether Pennsylvania intends to apply a confidence interval to the growth model calculations. The Pennsylvania Growth Model Amendment Scheme on page 31 of the proposal indicates the growth model will incorporate a confidence interval. Please note that the Department has not approved the application of a confidence interval with the growth model in any state that has been approved to include a growth model in its accountability system. Please see the concerns regarding confidence intervals cited in the peers' 2006 cross-cutting document (please see <http://www.ed.gov/admins/lead/account/growthmodel/cc.doc>)

Principle 2. Establishing appropriate growth model targets at the student level

- Has the state proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets? (Principle 2.1)
 - Has the state adequately described a sound method of determining student growth over time? (Principle 2.1.1)
 - Please clarify what is meant by the statement found on page 27 that projections are made only for those students who have at least three data points.
 - Please clarify Pennsylvania's plans to evaluate the growth model and growth targets, including how the evaluation will be independent and what simulations and analyses will be reviewed.
 - Please provide additional detail regarding the recalculating of scores. According page 8 of the appendices if a district/school fails to meet its PPI threshold, a new baseline is established how does this fit in with the goal of universal proficiency by 2013–14?

Principle 3. Accountability for reading/language arts and mathematics separately

- Has the State proposed a technically and educationally sound method of holding schools accountable for student growth separately in reading/language arts and mathematics? (Principle 3.1)
 - Does the model include assessments for other content areas (e.g., covariance matrices to estimate student performance or projected performance in a content area)? (Principle 3.1.1)
 - Please clarify whether the Pennsylvania growth model will use results from other assessments and, if so, how does Pennsylvania plan to demonstrate that achievement on those other assessments does not compensate for failure to achieve proficiency in reading/language arts or mathematics.

Principle 4. Inclusion of all students

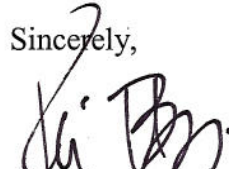
- Does the state's growth model address the inclusion of all students, subgroups, and schools appropriately? (Principle 4.1)
 - Does the state's growth model address the inclusion of all students appropriately? (Principle 4.1.1)

- Please clarify how growth model data will be attributed for AYP purposes when a student moves from one school to another or one district to another.

I hope you will consider the suggestions provided in this letter and submit a revised proposal. The additional information you provide will be considered an addendum to Pennsylvania's October 15 submission and will be included in the review process for this pilot. The information should be submitted no later than November 12, 2008. Please provide the information to Patrick Rooney (Patrick.Rooney@ed.gov).

I appreciate your interest in the growth model pilot. If you have any questions regarding this request, please contact Patrick Rooney at the email address above or by calling (202) 205-8831.

Sincerely,



Kerri L. Briggs, Ph.D.

cc: Governor Edward Rendell
Shula Nedley